

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC
COUNTY JUDGES AND COUNTY
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

UNOPPOSED MOTION TO ENTER CONSENT PRODUCTION ORDER

The United States respectfully requests that the Court enter the accompanying Consent Production Order. Pursuant to the Privacy Act of 1974, 5 U.S.C. § 552a(b)(11), and regulations at 20 C.F.R. § 401.180, the Social Security Administration requires such an order in order to produce to all parties, who are subject to this Court's protective orders (ECF Nos. 105 and 174) in this consolidated litigation, the results of its database comparison process. As such, this production order is justified by Rule 26(c) of the Federal Rules of Civil Procedure and relevant case law and is necessary for the parties to obtain relevant and essential discovery. Prompt entry of this order is necessary for the timely conduct of discovery in this action.

The United States has consulted with counsel for the other parties and none oppose this motion. The United States, therefore, respectfully requests that the attached Consent Production Order be adopted and ordered by the Court.

Date: May 9, 2014

KENNETH MAGIDSON
United States Attorney
Southern District of Texas

Respectfully submitted,

JOCELYN SAMUELS
Acting Assistant Attorney General
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CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2014, I served a true and correct copy of the foregoing via the Court's ECF system on the following counsel of record:

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